PROPOSAL EVALUATION

Proposition 50, Chapter 8 Integrated Regional Water Management Grant Program Implementation Step 2 Proposals

PIN: 9601

Applicant Name: San Luis and Delta Mendota Water Authority **Project Title:** Westside Regional Drainage Plan Proposal

Funds Requested: \$ 25,000,000 **Total Project Cost:** \$ 60,596,100

Total Proposal Score: 112

Description: The Westside Regional Drainage Plan Proposal is a series of integrated projects designed to eliminate subsurface agricultural production drainage from about 100,000 acres of drainage impacted lands on the west side of the San Joaquin Valley. It also includes water demand reduction; groundwater pumping and management; water transfers elements and drainage treatment to provide for drainage control; and improve water supply reliability for the partners executing the Plan.

Question: Adopted IRWMP and Proof of Formal Adoption

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The IRWMP (Westside Integrated Water Resources Plan) was adopted by the applicant on May 4, 2006.

Question: Description of Region

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The region is described as the sum of the areas served by the applicant's Member Agencies along the Westside of the San Joaquin Valley and Central Coast. A map of the region is provided which shows general water infrastructure and land use divisions. Throughout the IRWMP, the applicant provides detailed text descriptions of its region, which it breaks down into Divisions. The water quality and quantity conditions are generally presented well and data gaps are discussed. Within each Division, environmental, social, cultural, and economic characteristics are described. The applicant was convincing in its explanation of why this region is appropriate for water management.

Question: Objectives 5

The applicant lists the objectives of the IRWMP and states that the projects within the IRWMP began locally and were developed through forums sponsored by the applicant. Examples of regional cooperation are provided. Eleven main objectives are listed that discuss water management strategies which address water supply reliability, drainage, and quality. Within each objective discussion are project examples from the IRWMP and how each project would help solve regional water-related concerns.

Question: Water Management Strategies and Integration

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The IRWMP presents the water management strategies employed and the regional objectives achieved for each project. Overall, the IRWMP provides a good presentation of how the applicant's projects would achieve the objectives of the IRWMP. The strategies that are listed detail the benefits to water supply, water quality, and other objectives. More concise arguments and a better presentation of integrated strategies are still warranted. Specifically, the addition, since the Step 1 application, of a short description of how the projects are related to the IRWMP does not fully address the need to better present the integration of strategies.

Question: Priorities and Schedule

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The additions to the IRWMP, since Step 1, do not completely address the criteria. The schedule is improved and includes the current status and the proposed work schedule for project completion. The process to arrive at priorities remains unclear. The difference between short- and long-term priorities could be better explained. The Arroyo Pasajero Flood Control Project is a short-term priority and the Arroyo Pasajero Banking Project is a long-term priority. However, looking at the schedule they are implemented on the same time line. The process for moving from long- or short-term priority to project ranking warrants explanation. While the applicant indicates that the process is flexible and it appears project ranking will be reviewed approximately every 2 years, it is not clear what criteria would be applied to projects to determine a shift in implementation.

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Question: Implementation 3

Overall, the projects in the IRWMP appear technically feasible and the time lines appear realistic. The projects are described as not being interdependent to emphasize flexibility in implementation. However, each project is interdependent in terms of achieving regional objectives. The institutional structure that will ensure plan implementation is not clearly discussed. There is discussion of institutional support for project implementation that describes three management scenarios that might occur for any project. While it is reasonable to show the flexibility for completing projects, what is missing from this discussion is what and who assures the plan will be implemented.

Question: Impacts and Regional Benefits

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No changes made in IRWMP since the Step 1 submittal. The impacts and benefits are presented. Throughout the IRWMP, regional cooperation is described and direct benefits that relate to water reliability, drainage, and quality are qualified. The applicant indicates that proposed feasibility studies will better identify direct impacts and benefits outside of water-related objectives. However, there is no obvious discussion of a negative impacts evaluation within the region or in adjacent areas. In the IRWMP, economic benefits as a result of better water supply and quality were analyzed. DACs are discussed and the economic benefits provided to DACs through implementation of the IRWMP are stated and quantified.

Question: Technical Analysis and Plan Performance

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Only projects identified as ready for implementation are discussed. The applicant states that for the purposes of the IRWMP technical analysis is neither required nor beneficial. Summaries of the technical analysis and results used to design the banking project are provided, and general methods for monitoring performance are indicated. The IRWMP does not have a good description of the technical aspects of the project, but does describe the general methods that would indicate performance standards. The IRWMP discusses performance monitoring systems and mechanisms to adapt project operations for the projects ready for implementation, but no region-wide mechanisms or systems are presented.

Question: Data Management

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Although changes were made to the IRMWP since Step 1, the changes did not fully address the comments from Step 1. Data management methods are discussed, but are very general in nature. The applicant will disseminate banking data through meetings and press releases, and will format information consistent with DWR's DMS. Some information regarding existing monitoring efforts is provided. No information regarding data gaps were identified for either project; no references to SWAMP or GAMA were made. There is not a sufficient discussion of how data will be managed.

Question: Financing 4

The IRWMP identifies beneficiaries for some of the projects and identifies potential the funding and financing for plan implementation for some of the projects. The IRWMP discusses some ongoing support and financing for O&M costs for some of the projects. Much more work has been done in this section than the previous version, but not all projects have all the requested information.

Question: Relation to Local Planning & Sustainability

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No changes made in IRWMP since the Step 1 submittal. The applicant's member agencies do not, in general, have land use planning authority. Therefore, the applicant indicates that local water agencies and governments have initiated discussions to identify resource management issues related to growth and are beginning to develop formal processes to ensure mutually-acceptable outcomes. As water planning progresses, more interaction with government agencies will be undertaken. In general, the applicant presents what plans exist, but does not discuss how the IRWMP will ultimately relate to those plans. The dynamics between the IRWMP and the land use plans are not discussed.

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Question: Stakeholder Involvement & Coordination

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The IRWMP does not contain provisions for stakeholder involvement. Stakeholder involvement is focused at the project level. As the applicant is the regional agency, most discussion of stakeholders is limited to member agencies. The IRWMP contains some project specific examples of stakeholder involvement and stakeholder lists (primarily water agencies and government agencies). The IRWMP has does not discuss EJ concerns or DACs in the region. Although stakeholder involvement is focused on the project level, the IRWMP should still discuss how the regional view is effectively communicated to stakeholders. The IRWMP should also address how stakeholders give feedback as to the direction of the IRWMP.

Weighted IRWMP Total Score: 24

Ouestion: Work Plan 9

The work plan contains all necessary components. Improvements are necessary for the tasks to better correspond with the budget and schedule. The procedure section for each project is general as to the work needing to be performed. Project tasks are buried in multiple text sections. As written, it seems most of the projects are at the conceptual stage. The write up makes it difficult to define each project. The end result of Project 3 should be better defined. Project 5 consistency with the Drainage Management Plan for the Westside San Joaquin Valley should be clarified.

Question: Budget 3

A summary budget and a budget for each project are presented. The lack of detail in the individual project budgets and work plan makes it difficult to decipher whether the items in the budget agree with the work plan. There is a discrepancy on the budget for Project 2 in the non-State funds (match) of \$10,000 in (d) Construction/Implementation. The construction contingencies are on the high side which most likely reflects the early stage of the projects.

Question: Funding Match 4

The funding match is 50% of the total proposal costs.

Ouestion: Schedule 4

The schedules indicate all projects will begin construction or implementation by December 1, 2007. The work plan generality makes it difficult to determine if the schedules are consistent with the work plan or if they are reasonable. The Project 6 work plan indicates that some feasibility work would be done to identify which alternative would move to the pilot project stage, but the schedule does not include any time to do the feasibility work. Project 4 schedule contains no time line for CEQA but text indicates CEQA will be complete before construction.

Question: Scientific and Technical Merit

12

Most projects contained in the proposal are supported by thorough and well documented studies and data. However, the modeling study for the deep aquifer pumping project focused only on effects of pumping on drainage volume and not on the sustainability of applying pumped water to fields. The pumping project's consistency with the San Joaquin Valley Drainage Implementation Plan (2000) and the recommendations of the San Joaquin River Water Quality Management Group (2005) should be clarified.

Question: Monitoring, Assessment and Performance Measures

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The project performance measures tables include all requested items. The output indicators effectively track the desired output proposed at a minimum and will evaluate change resulting from the work. It is feasible to meet the targets within the life of the proposal.

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Question: Economic Analysis

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The PV of the costs is \$135 million and the PV of the benefits is \$162 million. The without-project condition requires drainage to the San Luis Drain and River to cease by 2009. This would curtail irrigation, lands would salt up, and agricultural production would cease. The benefits of continued agriculture are counted. Given how the without-project condition is defined, there is no water quality benefit. Additional benefits of water supplies (65,900 AF) developed by conservation and groundwater are counted. The cost of the treatment plant is for a pilot facility; however, the benefits of 3,000 AF are from a full-scale facility. Landowner costs should be counted. Although under this proposal salts would continue to accumulate in the region, the anticipated benefits are relatively certain.

Question: Other Expected Benefits

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The Other Expected Benefits are benefits are designed to present benefits other than water quality and water supply from implementation of the proposal. The applicant primarily addressed water quality benefits for this section. Credit was given to ecosystem restoration in the lower San Joaquin River even though the discussion was limited to improved water quality, specifically TMDLs.

Question: Program Preferences

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The proposal addresses multiple Program Preferences and demonstrates a significant amount of certainty that the Program Preferences claimed can be achieved. The applicant was able to document the magnitude and breadth of Program Preferences the proposal will meet and includes supporting documents. The proposal includes integrated projects with water quality and water quantity benefits, contributes measurably to long-term attainment and maintenance of water quality standards, and will eliminate or significantly reduce pollution in the San Joaquin River.

Question: Statewide Priorities 30

The proposal reduces conflict between water users; contributes to the attainment of salt, boron and dissolved oxygen TMDLs; implements WMIs for selenium, boron, salts, and pesticides; implements the NPS Plan by implementing a drainage plan; and assists in meeting Delta Water Quality Objectives for dissolved oxygen. Implementation of desalination projects could possibly address EJ concerns - sustainable farming for DACs. The proposal assists meeting the goals of the CALFED Bay Delta Program by addressing drainage problems of San Joaquin River. The anticipated benefits are relatively certain and are interregional in their extent.

Total Proposal Score: 112

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